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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

<i>In the matter of:</i> Venice Main Post Office Venice, California 90291 (Mark Ryavec and Venice Stakeholders Association, Petitioners)	Docket No. A2012-17
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**REPLY BRIEF OF PETITIONERS VENICE STAKEHOLDERS ASSOCIATION AND
MARK RYAVEC**

Petitioners Venice Stakeholders Association and Mark Ryavec (collectively “Petitioners”) filed their Initial Brief on December 9, 2011. Under Order No. 967, the deadline for the Postal Service to file its answering brief was December 27, 2011. As of January 10, 2012, the Postal Service has not yet filed its answering brief and does not appear to intend to do so.

Throughout this process, the Postal Service has not shown how it will relocate the services lost to the people in the Venice community under its decision to close the Venice Main Post Office. Although it repeatedly calls this action a relocation, the Postal

Service has refused opportunities to show how this specific situation fits that label by failing to respond to Petitioners' Initial Brief and by fighting Petitioners' request to provide additional information.¹ Thus it is clear the decision to close the Venice Main Post Office is a closure, not a relocation, and this Commission has jurisdiction to decide this appeal.

Wherefore, because the Postal Service's decision to close the Venice Main Post Office fits the definition of a closure under 39 U.S.C. § 404 and 39 C.F.R. § 241.3 and is without observance of procedure required by law, the Commission has jurisdiction to review the Postal Service's determination in this matter and should order the matter returned for further consideration.

DATED: January 10, 2012

/s/ Julie Kimball
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¹ See United States Postal Service Response to Motion to Compel Redacted Information Not Included in Response to Order No. 967, filed on December 14, 2011 in response to Petitioners' Motion to Compel Redacted Information and Any Additional Relevant Documentation Not Included in the Administrative Record Filed December 2, 2011.